

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
NORTHEASTERN DIVISION

Tri-Cities Holdings LLC et al.)	
)	
Plaintiffs,)	
)	
)	Case No. _____
)	
City of Johnson City et al.,)	
)	
Defendants.)	
_____)	
)	

DECLARATION OF JOHN DOE NO. 3

I, [REDACTED], do declare under penalty of perjury and, if called as a witness, I would testify as follows:

1. I am over the age of 18 and a resident of Bluff City, Tennessee.
2. For purposes of this action, I wish to remain anonymous due to the social stigma related to opioid addiction.
3. I am, and I wish to be referred to as, John Doe No. 3 in this action.
4. I have lived in Bluff City, Tennessee from 1984 to the present.
5. I have been addicted to opiates for more than one year.
6. My opiate addiction began in 2002 when I began taking Loratab for pain management.
7. Presently, I am not taking any illegal drugs.
8. I am currently employed.
9. Presently, I am participating in a supervised rehabilitation program employing

opioid replacement therapy (ORT) employing methadone that I take under medical supervision at the following clinic: The Stepping Stone of Boone clinic located in Boone, North Carolina, (hereinafter “my current clinic”).

10. I require methadone to effectively treat my opiate addiction. Buprenorphine or Suboxone are not as effective in treatment of my opiate addiction as methadone.

11. Presently, because there is no local ORT methadone treatment option, I have to wake up at 3:30AM, six (6) times per week and drive 120 miles roundtrip to my current clinic for my medication.

12. The drive to my current clinic is through mountain roads and sometimes I must make the drive in rain and snow even when I consider conditions dangerous to drive in. But I must make the drive for my ORT medication or otherwise I will experience withdrawal symptoms which include the following: fever, chills, vomiting, diarrhea, and dehydration.

13. I would immediately become a client of Tri-Cities Holdings LLC if it is allowed to open up a methadone treatment clinic in Johnson City, Tennessee. This would save me approximately 100 daily miles of driving, approximately 18 weekly hours of driving, and approximately \$150 weekly in gasoline and other costs each year that I presently devote to driving to my current clinic.

14. The distance I presently must drive to my current clinic makes it very difficult for me to stay in treatment. I would be substantially more likely to stay with my treatment program if it were offered in Johnson City, Tennessee.

15. I consider my opiate addiction an impairment that substantially limits a major life activity of mine which would include, without limitation, the following limitations on major life activities: Time available to work and earn income, time with family, and time for rest and sleep.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 18, 2013.

